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16 *Attorneys for Defendant Zuffa, LLC, d/b/a*
17 *Ultimate Fighting Championship and UFC*

18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20
21 Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
25 Championship and UFC,

26 Defendant.

Case No. 2:15-cv-01045 RFB-(PAL)

**ZUFFA, LLC'S CONSOLIDATED
NOTICE OF RELATED CASES
PURSUANT TO LOCAL
RULE 7-2.1**

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting
7 Championship and UFC,

8 Defendant.

Case No. 2:15-cv-01055 APG-(GWF)

9 Brandon Vera and Pablo Garza, on behalf of
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting
14 Championship and UFC,

15 Defendant.

Case No. 2:15-cv-01056 RFB-(GWF)

16 Gabe Ruediger and Mac Danzig, on behalf of
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.

Case No. 2:15-cv-01057 JCM-(CWH)

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1 Kyle Kingsbury and Darren Uyenoyama, on
2 behalf of themselves and all others similarly
situated,

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting
6 Championship and UFC,

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8 Defendant.

Case No. 2:15-cv-01046 RCJ-(NJK)

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Defendant Zuffa, LLC (“Zuffa”), by and through undersigned counsel, hereby files this Notice of Related Cases Pursuant to Local Rule 7-2.1, to inform the Court that the actions of *Le, et al. v. Zuffa, LLC, d/b/a/ Ultimate Fighting Championship and UFC*, No. 2:15-cv-01045 RFB-(PAL), *Vazquez, et al. v. Zuffa, LLC, d/b/a/ Ultimate Fighting Championship and UFC*, No. 2:15-cv-01055 APG-(GWF), *Vera, et al. v. Zuffa, LLC, d/b/a/ Ultimate Fighting Championship and UFC*, No. 2:15-cv-01056 RFB-(GWF), *Ruediger, et al. v. Zuffa, LLC, d/b/a/ Ultimate Fighting Championship and UFC*, No. 2:15-cv-01057 JCM-(CWH), and *Kingsbury et al. v. Zuffa, LLC, d/b/a/ Ultimate Fighting Championship and UFC*, No. 2:15-cv-01046 RCJ-(NJK) are related and should be assigned to a single District Judge and a single Magistrate Judge.

On June 2, 2015 United State District Judge Edward J. Davila of the Northern District of California ordered all five of these cases, which had been related to each other in the Northern District¹, to be transferred to this District.² All five actions bring one claim under § 2 of the Sherman Act, against the same defendant, brought by the same counsel³, and seek to represent the exact same classes of individuals over the same purported class period. Save for the paragraphs identifying the named Plaintiffs in each separate matter, the language of the five Complaints themselves are virtually identical. Assigning these five cases to a single District Judge and a single Magistrate Judge will result in substantial savings of judicial effort, as well as duplicative efforts by the parties, aid in the efficient management of the cases, and prevent potentially contradictory rulings.

The following is a brief summary of pending motions in the matter:

¹ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 18 (relating *Vazquez*), Dkt. 19 (relating *Vera*), Dkt. 59 (relating *Ruediger*), Dkt. 67 (relating *Kingsbury*). For simplicity, Zuffa includes only the docket cites from *Le* and does not include corresponding docket citations from the other actions.

² *Le*, No. 5:14-cv-05484, Dkt. 93; *Vazquez*, No. 5:14-cv-05591-EJD, Dkt. 62; *Vera*, No. 5:14-cv-05621-EJD, Dkt. 62; *Ruediger*, No. 5:15-cv-00521-EJD, Dkt. 39; *Kingsbury*, No. 5:15-cv-01324-EJD, Dkt. 34.

³ The *Le*, *Vazquez*, *Vera*, and *Kingsbury* Plaintiffs are represented by identical counsel. The *Ruediger* Plaintiffs are represented by one common law firm with the other four cases, The Joseph Saveri Law Firm, as well an additional law firm not associated with the other four Complaints.

1 1. Defendant has filed consolidated motions to dismiss all five complaints. These
2 motions are fully briefed but have not been argued.⁴

3 2. Plaintiffs have filed a motion to consolidate the five cases for pretrial purposes.
4 Defendant agrees that the cases should be consolidated but contends that the cases should be
5 consolidated for all purposes, not just pretrial purposes, and has cross-moved to that effect.⁵

6 3. Plaintiffs have moved to be appointed interim co-lead class counsel. Defendant
7 did not take a position on this motion.⁶ No Nevada attorneys were listed in Plaintiffs' motion in
8 the Northern District. Defendant is not aware of Plaintiffs' intentions with regard to this motion
9 now that the cases have been transferred.

10 4. Defendant filed a motion to stay discovery in the Northern District of California,⁷
11 which per stipulated order entered by Judge Davila was held in abeyance without response by the
12 Plaintiffs pending resolution of the transfer motion.⁸

13 On June 5, Judge Gordon of this District issued a Minute Order ordering a joint status
14 report to be filed by Friday, June 12, 2015 in *Vazquez, et al. v. Zuffa, LLC*, No. 2:15-cv-01055
15 APG-(GWF), Dkt. 66. Also, on June 5, Magistrate Judge Koppe of this District denied Zuffa's
16 Motion to Stay Discovery without prejudice with the option to re-file and address relevant case
17 law in this District in *Kingsbury et al. v. Zuffa, LLC*, 2:15-cv-01046 RCJ-(NJK), Dkt. 29. In
18 addition, standard Minute Orders were issued in three cases. *Vazquez et al. v. Zuffa*, No. 5:15-cv-
19 01055 APG-(GWF), Dkt. 65; *Vera et al. v. Zuffa*, No. 5:15-cv-01056 RFB- (GWF), Dkt. 65;
20 *Ruediger et al. v. Zuffa*, No. 2:15-cv-01057 JCM-(CWH), Dkt. 42. As of the time of this filing,
21 there have been no other rulings or orders issued in this District.

22 ⁴ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 64 (Zuffa's Motion to Dismiss); Dkt. 71
23 (Plaintiffs' Opposition to Motion to Dismiss); Dkt. 82 (Reply in Support of Motion to
Dismiss).

24 ⁵ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 52 (Plaintiffs' Motion to Consolidate),
25 Dkt. 62 (Zuffa's Amended Cross Motion to Consolidate for All Purposes); Dkt. 66
(Plaintiffs' Reply in Support of Consolidation).

26 ⁶ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 58 (Plaintiffs' Motion to Appoint Interim
Co-Lead Class Counsel); Dkt. 63 (Zuffa's Statement of Non-Opposition).

27 ⁷ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 87.

28 ⁸ *Le, et al. v. Zuffa, LLC*, Case No. 5:14-cv-05484, Dkt. 91.

1 For the foregoing reasons, Zuffa respectfully submits that the five above-captioned actions
2 are related and should be assigned to one District Judge and one Magistrate Judge.

3 Dated June 8, 2015

Respectfully submitted,

4 BOIES, SCHILLER & FLEXNER LLP

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6
7 By:


RICHARD J. POCKER

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2015, I caused to be e-mailed and deposited in the United States Mail, postage prepaid, a true and correct copy of the foregoing, **ZUFFA, LLC'S CONSOLIDATED NOTICE OF RELATED CASES PURSUANT TO LOCAL RULE 7-2.1** addressed as follows:

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